

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

Case No. 2:22-cv-00125-JRG

JOINT NOTICE OF READINESS FOR TRIAL

Plaintiff Entropic Communication, LLC (“Entropic”) and Defendant Charter Communications, Inc. (“Charter”) file this Joint Notice of Readiness for Trial for a trial term that would begin on Monday, January 8, 2024.

Position of Plaintiff: Entropic states that it is ready for trial on January 8, 2024.

Counsel for Entropic has been notified that its infringement expert for three patents, Dr. Shoukri Souri, has a deposition scheduled for January 11 in an insurance recovery action, *Aspen Specialty Insurance Company, et al., v. Nucor Corporation and Nucor Steel Louisiana, LLC*, in the General Court of Justice, Mecklenburg County, North Carolina, Case No. 19-CVS-19887. Counsel for Entropic suggested the possibility of the deposition being rescheduled so as not to burden this Court with a deposition scheduling issue, but received a response from counsel in the other matter stating that rescheduling the deposition will be “extremely difficult” and requesting that Entropic advise this Court of their scheduling conflict and desire to avoid attempting to reschedule Dr. Souri’s deposition.

Position of Defendant: Defendant Charter Communications, Inc. provides notice to the Court regarding its readiness for trial on January 8, 2024. Charter has a conflict with the date. One

of Charter's fact witnesses it intends to call at trial will be out of the country January 6-13, 2024. Additionally, Charter's lead trial counsel, Deron Dacus, is scheduled for trial as lead trial counsel in *Ravgen Inc. v Natera Inc. et al*, 1:20-cv-692-ADA (W.D. Tex.) in the Austin Division with jury selection set for January 4, 2024 and trial set for January 8, 2024. Finally, Charter's technical expert, Dr. Kevin Almeroth, will be returning from an overseas trip late on January 7, 2024.

Regarding Charter's readiness for trial on January 22, 2024, Charter also has a conflict. Charter's corporate representative and trial witness is unavailable because his spouse has a medical procedure the week of January 22, 2024. Mr. Dacus is scheduled for trial as lead trial counsel in *Dexon Computer Inc. v. Cisco Systems, Inc. et al*, 5:22-cv-53-RWS-JBB (E.D. Tex.) in the Texarkana Division with jury selection and trial set for January 22, 2024. Charter's damages expert, Christopher Bakewell, is scheduled to be an expert witness in *Centripetal Networks, LLC v. Palo Alto Networks, Inc.*, 2-21-cv-00137 (E.D. Va.) on January 22, 2024. Further, Dr. Almeroth is scheduled to be an expert witness in *Certain Wi-Fi Routers, Wi-Fi Devices, Mesh Wi-Fi Network Devices, and Hardware and Software Components Thereof* (ITC Inv. No. 337-TA-1361), scheduled for trial January 17-23, 2024.

Dated: November 30, 2023

Respectfully submitted,

/s/James Shimota by permission Andrea L. Fair

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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on November 30, 2023.

/s/Andrea L. Fair
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